1	ISMAIL J. RAMSEY (CABN 189820) United States Attorney	
3	MARTHA BOERSCH (CABN 126569) Chief, Criminal Division	
4 5	ERIC CHENG (CABN 274118) AJAY KRISHNAMURTHY (CABN 305533) ALETHEA M. SARGENT (CABN 288222)	
6	Assistant United States Attorneys	
7	1301 Clay Street, Suite 340S Oakland, California 94612	
8	Telephone: (510) 637-3680	
	Eric.Cheng@usdoj.gov	
9	Alethea.Sargent@usdoj.gov	
10	Attorneys for United States of America	
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	OAKLAND DIVISION	
14	IDUTED STATES OF AMEDICA) C N 22 CD 002(4 ICW)
15	UNITED STATES OF AMERICA,) Case No. 23-CR-00264-JSW
16	Plaintiff,	UNITED STATES' RESPONSE TO PROPOSED JUROR QUESTIONNAIRE
17	V.) Pretrial Conf.: July 8, 2024
18	(2) MORTEZA AMIRI and (3) AMANDA CARMELLA THEODOSY,) Trial: August 5, 2024) Court: Honorable Jeffrey S. White
19	a/k/a AMANDA CARMELLA NASH,))
20	Defendants.))
21		
22	Pursuant to the Court's June 26, 2024 order, Dkt. 237, the United States proposes the following	
23	addition to the Juror Questionnaire:	
24	Have you, or has anyone close to you, ever been accused, arrested, charged, or convicted of a criminal offense (other than a minor traffic violation)?	
25	If yes, please explain the circumstances.	
26	The United States submits that such a question will allow the Court and the parties to determine	
27	whether potential jurors have strong positive or negative feelings about the criminal justice system that	
28		
	USA Response to Juror Questionnaire	

23-CR-264-JSW

could affect their ability to serve as fair and impartial jurors. If the Court is not inclined to add such a question, the United States respectfully requests that the Court alter the existing Question 8 so that it more clearly covers criminal cases: Have you, your relatives, or anyone close to you ever been involved in a lawsuit or criminal prosecution of any kind either as a plaintiff, defendant, or witness? **DATED:** July 2, 2024 Respectfully submitted, ISMAIL J. RAMSEY United States Attorney $/_{\rm S}/$ ERIC CHENG AJAY KRISHNAMURTHY ALETHEA SARGENT **Assistant United States Attorneys**